

James H. Power
Marie E. Larsen
HOLLAND & KNIGHT LLP
31 West 52nd Street
New York, New York 10019
Telephone: (212) 513-3200
Fascimile: (212) 385-9010
Email: james.power@hklaw.com
marie.larsen@hklaw.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE APPLICATION OF
TATIANA AKHMEDOVA,

Applicant,

REQUEST FOR DISCOVERY PURSUANT
TO 28 U.S.C. § 1782.

Civil Action No. 19-mc-26 (JPO)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 37, Applicant Tatiana Akhmedova (“Applicant”), will hereby move this Court as soon as counsel can be heard at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, before the Honorable J. Paul Oetken, United States District Judge, Southern District of New York, for an order against Y.Co NY Inc. compelling the production of documents in accordance with the *subpoena duces tecum* properly served on it pursuant to this Court order granting discovery in aid of one or more foreign proceedings under 28 U.S.C. § 1782.

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, Applicant shall rely on the memorandum of law and supporting Declaration of James H. Power submitted herewith as well as the pleadings submitted heretofore by Applicant.

Dated: New York, New York
July 6, 2020

Respectfully submitted,

By: /s/ James H. Power

James H. Power

Marie E. Larsen

HOLLAND & KNIGHT LLP

Counsel for Tatiana Akhmedova

31 West 52nd Street

New York, NY 10019

Telephone: (212) 513-3200

Facsimile: (212) 385-9010

Email: james.power@hklaw.com

marie.larsen@hklaw.com